

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PEARSON EDUCATION, INC., :
JOHN WILEY & SONS, INC., :
CENGAGE LEARNING INC. AND :
THE MCGRAW-HILL COMPANIES, INC., :

Plaintiffs, :

-against-

07 Civ. 9399 (CSH)
ECF Case

VINOD KUMAR, VIRENDER YADAV :
AND SUKHWINDER SINGH D/B/A :
MODERN BOOKS D/B/A EXPRESS :
BOOKS AND JOHN DOES NOS. 1-5, :

Defendants. :

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CASE MANAGEMENT PLAN

This Civil Case Management Plan, submitted in
accordance with Rule 26(f), Fed. R. Civ. P., in accordance with
Rule 16(f), Fed. R. Civ. P.

A. Initial Disclosures:

1. Plaintiffs served voluntary disclosure under Rule 26(a) on defendant Virender Yadav on January 9, 2008.
2. Plaintiffs will serve voluntary disclosure under Rule 26(a) on defendant Vinod Kumar by February 8, 2008.
3. Defendants Virender Yadav and Vinod Kumar will serve voluntary disclosure under Rule 26(a) on plaintiffs by February 8, 2008.

4. No changes in timing, form, or requirement for disclosures under Rule 26(a) should be made.

B. Subjects of Discovery: Discovery may be needed on the subjects of (i) the liability of defendants' for making infringing sales of plaintiffs' copyrighted materials; (ii) the extent of defendants' infringing sales; and (iii) the amount of defendants' profits from those infringing sales. This will require separate depositions of defendants Virender Yadav and Vinod Kumar, as well as subpoenas of third parties for documents. Discovery should be completed by May 28, 2008. Discovery need not be conducted in phases or limited to or focused on particular issues.


1. Plaintiffs served document requests and interrogatories on defendant Virender Yadav on January 9, 2008.
2. Defendant Virender Yadav provided some responsive documents on January 15, 2008.
3. Plaintiffs will serve document requests and interrogatories on defendant Vinod Kumar by February 8, 2008.
4. Defendants Virender Yadav and Vinod Kumar will serve document requests and interrogatories on plaintiffs by February 8, 2008.


- C. Electronically Stored Information: There are no issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced.
- D. Privilege or Protection: There are no issues about claims of privilege or of protection as trial-preparation materials. Parties do not agree on a procedure to assert these claims after production.
- E. Rules Changes: Plaintiffs should be allowed to take an additional deposition of Virender Yadav, if necessary. No additional changes should be made to the limitations on discovery and no limitations should be imposed.

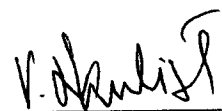
F. The court should not issue any other orders under Rule 26(c) or under Rule 16(b) and (c).

Dated: January 30, 2008

DUNNEGAN LLC

By 
William Dunnegan (WD9316)
Megan L. Martin (MM4396)
Attorneys for Plaintiffs
Pearson Education, Inc.,
John Wiley & Sons, Inc.,
Cengage Learning Inc., and
The McGraw-Hill Companies, Inc.
350 Fifth Avenue
New York, New York 10118
(212) 332-8300


Virender Yadav
Defendant
10433 92nd Avenue
South Richmond Hill, New York
11418-2923


Vinod Kumar
Defendant
39 /4 Mohmad Pur
Near Bikaji Cama Place
New Delhi 110066
India

SO ORDERED:

U.S.D.J.